

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

KENNETH D. BELL, in his capacity as court-appointed Receiver for Rex Venture Group, LLC d/b/a ZeekRewards.com,)
Plaintiff,)
vs.)
TODD DISNER, in his individual capacity and in his capacity as trustee for Kestrel Spendthrift Trust;)
TRUDY GILMOND; TRUDY GILMOND, LLC;)
JERRY NAPIER; DARREN MILLER; RHONDA)
GATES; DAVID SORRELLS; INNOVATION)
MARKETING, LLC; AARON ANDREWS; SHARA)
ANDREWS; GLOBAL INTERNET FORMULA,)
INC.; T. LEMONT SILVER; KAREN SILVER;)
MICHAEL VAN LEEUWEN; DURANT)
BROCKETT; DAVID KETTNER; MARY)
KETTNER; P.A.W.S. CAPITAL MANAGEMENT)
LLC; LORI JEAN WEBER; and a Defendant Class)
of Net Winners in ZEEKREWARDS.COM;)
Defendants.)

No. 3:14-cv-91

**AFFIDAVIT OF EAMON MASON IN SUPPORT OF
MOTION TO ENTER FINAL JUDGMENTS
AGAINST NET WINNER CLASS MEMBERS**

I, Eamon Mason, being duly sworn, depose and state:

1. I am a Senior Project Manager at Garden City Group, LLC (“GCG”). I submit this affidavit in support of Plaintiff’s Motion to Enter Final Judgments Against Net Winner Class Members (the “Motion”). The following statements are based on my personal knowledge and if called on to do so, I could and would testify competently thereto.

2. Pursuant to the Court’s Order on Process for Determining the Amount of Final Judgments Against Net Winner Class Members (the “Process Order”) (Doc. No. 153), GCG assisted Kenneth D. Bell, the court-appointed Receiver for Rex Venture Group, LLC (“RVG”), with notifying members of the Net Winner Class of the amount of their ZeekRewards Net Winnings as reflected in the available books and records of the RVG Receivership. On February 9, 2017, GCG sent notice by email to the email addresses provided by each Net Winner in connection with the account included in determining the amount of Net Winnings informing them of the amount of their Net Winnings and providing a link to a secure online portal hosted by GCG with instructions for logging in to view the Receiver’s calculation of their Net Winnings. For any emails that could not be delivered, a postcard notice was sent to the Net Winner’s last known physical address. GCG monitored postcard notices returned as undeliverable and promptly re-mailed the notice if a forwarding address was provided to GCG by the United States Postal Service. GCG also posted notices on both the Receivership website at www.zeekrewardsreceivership.com and the Net Winner Class website at www.zeeknetwinnerclass.com advising of the procedures set forth in the Process Order with links to the online portal where Net Winners could log in to view the Receiver’s calculation of their Net Winnings.

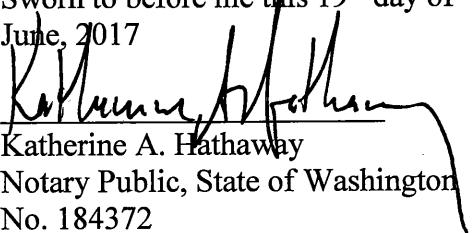
3. Each notice sent to members of the Net Winner Class instructed the Net Winner to provide a response on the online portal stating whether they accept or disagree with the Receiver’s calculation of their Net Winnings no later than 60 days from the notice date (the “Response Deadline”). Upon logging into the online portal, Net Winners were given the opportunity to review the Process Order and the calculation of their Net Winnings from the RVG records before indicating whether they accept or disagree with the determination. Net Winners

who disagreed were then given the opportunity to submit a specific proposed alternative calculation of Net Winnings, evidence supporting the alternative calculation, including independent documentation, and a detailed description of the specific facts relating to their disagreement with the Receiver's calculation of their Net Winnings and how they determined their alternate calculation.

4. Each Net Winner listed on Exhibit 1 to the Motion accepted the Receiver's calculation of their Net Winnings on the online portal prior to the Response Deadline, submitted a proposed alternative calculation of Net Winnings on the online portal prior to the Response Deadline that was acceptable to the Receiver, or failed to complete a response to the Receiver's calculation of their Net Winnings on the online portal prior to the Response Deadline.



Eamon Mason
Eamon Mason

Sworn to before me this 19th day of
June, 2017

Katherine A. Hathaway
Notary Public, State of Washington
No. 184372
Commission Expires: February 26, 2020

